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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §
841(b) (1) (A) (viii))

SANDY GANI,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

WILLIAM JOHNSTON, being duly sworn, deposes and states that he is a Special Agent of the Drug Enforcement Administration ("DEA"), duly appointed according to law and acting as such.

Upon information and belief, on or about June 29, 2012, within the Eastern District of New York and elsewhere, defendant SANDY GANI did knowingly, intentionally and unlawfully possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine.

(Title 21, United States Code, Section 841.)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On or about June 28, 2012, a County Sheriff in Los Angeles, California, notified the DEA that Federal Express had identified a package suspected to contain methamphetamine, that was scheduled to be delivered from "John P." in Los Angeles to "Sandy G." in Queens, New York, the following day.

2. The County Sheriff inspected the contents of the package and concluded, based on his training and experience, that it was crystal methamphetamine. The gross weight of the methamphetamine was approximately 226.80 grams.

3. Agents of the DEA created a "dummy" Federal Express package and delivered it to the address on the label in Queens, New York at approximately 2:25 p.m. on June 29, 2012.

4. Upon delivery, the defendant SANDY GANI accepted delivery of the package. She initially identified herself as "Wendy." Upon the request of the agents conducting the delivery, she took them to the apartment listed on the Federal Express label and gave them consent to enter, whereupon the agents identified themselves as law enforcement and told the defendant this was controlled delivery. The defendant SANDY GANI then identified herself as "Sandy Gani," and showed the agents her

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

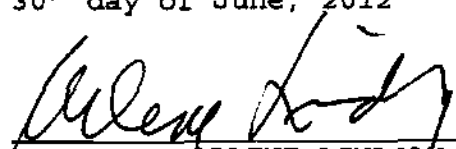
passport confirming her identity. She also confirmed that she resided in the apartment to which the package had been delivered.

5. The agents advised the defendant SANDY GANI of her Miranda rights, which she waived. She stated, in sum and substance, that she knew she was receiving a package containing crystal methamphetamine. Further, she gave the agents consent to search the apartment, and they found methamphetamine. She then showed the agents additional methamphetamine that she kept in the apartment. The total gross weight of the methamphetamine in the defendant's apartment was approximately 70 grams.

WHEREFORE, your deponent respectfully requests that defendant SANY GANI be dealt with according to law.


WILLIAM JOHNSTON
Special Agent
Drug Enforcement Administration

Sworn to before me this
30th day of June, 2012


HONORABLE ARLENE LINDSAY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK